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Signature Page]*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD GIBSON, and HERIBERTO
VALIENTE,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL,
CENDYN GROUP, LLC, THE
RAINMAKER GROUP UNLIMITED,
INC., CAESARS ENTERTAINMENT
INC., TREASURE ISLAND, LLC,
WYNN RESORTS HOLDINGS, LLC,

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
THE COMPLAINT**

(FIRST REQUEST)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Richard Gibson and Heriberto Valiente (“Plaintiffs”) and all served Defendants in this action, MGM Resorts International, Cendyn Group, LLC, Caesars Entertainment, Inc., Treasure Island, LLC, Wynn Resorts Holdings, LLC (together, “Defendants”)¹, by and through their respective counsel and pending the Court’s approval, that Defendants shall have an additional thirty days to answer or otherwise respond to the Complaint [ECF No. 1]. Defendants’ original response deadline is February 23, 2023. With an additional thirty days, Defendants’ deadline to respond to the Complaint is extended to March 27, 2023. In the event that Defendants move to dismiss the Complaint, the parties shall meet and confer and thereafter submit to the Court a mutually agreeable schedule for further briefing on any such motions.

Good cause exists for the extension set forth herein. Defense counsel were only recently retained in this matter and require additional time to determine how best to address Plaintiffs’ Complaint. The proposed extension also addresses conflicts with the schedules of counsel. This is the first extension requested for Defendants to respond to the Complaint and is not made for the purpose of delay.

IT IS SO ORDERED:



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: February 22, 2023

¹ One additional named defendant in the Complaint, The Rainmaker Group Unlimited, Inc., has not appeared in the action. The parties believe that a stipulation is appropriate as all appearing parties are stipulating to the requested schedule; alternatively, the court may treat the stipulation as an unopposed joint motion under Local Rule 7-1(c).

DATED: February 21, 2023

/s/ Bradley Austin

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² Counsel will comply with LR IA 11-2 within 14 days.

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EXHIBIT 1

[Proposed] Order Granting Stipulation to Extend Time for Defendants to Respond to the Complaint (First Request)

EXHIBIT 1

[Proposed] Order Granting Stipulation to Extend Time for Defendants to Respond to the Complaint (First Request)

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 RICHARD GIBSON, and HERIBERTO
12 VALIENTE,

13 Plaintiff,

14 vs.

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16 MGM RESORTS INTERNATIONAL,
17 CENDYN GROUP, LLC, THE
18 RAINMAKER GROUP UNLIMITED,
19 INC., CAESARS ENTERTAINMENT
20 INC., TREASURE ISLAND, LLC,
21 WYNN RESORTS HOLDINGS, LLC,

22 Defendants.
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Case No. 2:23-cv-00140-MMD-DJA

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO THE COMPLAINT**

(FIRST REQUEST)

1 Having considered the stipulation of the Parties, and finding good cause, IT IS
2 HEREBY ORDERED that Defendants MGM Resorts International, Cendyn Group,
3 LLC, Caesars Entertainment Inc., Treasure Island, LLC, Wynn Resorts Holdings, LLC
4 (together, “Defendants”) shall have an additional thirty days to respond to the
5 Complaint [ECF No. 1]. Defendants’ original response deadline is February 23, 2023.
6 With an additional thirty days, Defendants’ deadline to respond to the Complaint is
7 extended to March 27, 2023. In the event that Defendants move to dismiss the
8 Complaint, the parties shall meet and confer and thereafter submit to the Court a
9 mutually agreeable schedule for further briefing on any such motions.

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11
12 **IT IS SO ORDERED:**

13 _____
14 UNITED STATES DISTRICT JUDGE

15 Dated: _____
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